

I wish to add my support to the RM-11392 petition by Mark D. Miller seeking to change or eliminate from the Amateur Radio Service automatically controlled data stations and provide more realistic and workable bandwidth restrictions for the amateur HF spectrum.

The petition is necessary for the equitable and sensible use of the HF Amateur Radio Spectrum by all amateur radio operators and not by a small minority. Amateur Radio spectrum was first allocated, and I believe remains, shared spectrum. Amateur spectrum **SHOULD** be used for **REGULAR** amateur to amateur communications of a technical or personal nature. Increasingly these wideband modes are being used for amateur to third party and third party to third party "messaging". The legality of which is dubious at best. Is the PMBO operator personally inspecting every email his system forwards for amateur band appropriate content? Doubtful. **Amateur RADIO spectrum should never be allowed to be turned into some poor approximation of the internet.**

The petition provides relief from automated digital data transponders that operate regardless of whether or not a frequency is occupied. The modem used for wideband data is capable of busy detection and thus capable of discerning if a frequency is occupied or not. **The "administrator" of the system has asked all of the PMBO operators to disable this anti-interference feature because it slows down the system. Encouraging his users to INTENTIONALLY interfere with ongoing communications.**

The petition's proposed 1.5 kHz bandwidth limit on data emission is appropriate for amateur digital transmissions and equipment bandwidths used by the Amateur Radio Service. Some of those against the petition will argue that limiting bandwidth to some number will stifle innovation. **Which are more innovative, using wider and wider amounts of spectrum for marginal increases in throughput, or finding a way to pack more data into the same signal bandwidth? "Technical Innovation" is nothing more than a red herring. This is, at its best, 20 year old technology.**

The petition is an attempt to protect the Amateur Radio Service from a minority who are exploiting a loophole in the regulations to avoid paying for commercial email service, at the expense of, and without regard for other amateur radio operators. Please do not let this happen. Opponents of the petition no doubt will roll out the "emergency communications" straw man. Ask one of them to provide substantiated proof that wideband data/ HF email has saved anything other than the price of a subscription to a commercial HF email provider. They can't.

The FCC Amateur Radio Service's automatically controlled data sub-bands are already a source of problems from the volume of automated traffic from maritime interests. Again, these stations are fully autonomous and automatically respond regardless if the frequency is in use or not. If a limit of 1.5 kHz bandwidth is applied, it will enhance the ability of amateur radio operators to share these small band segments efficiently through improved data transmission methods.

I believe a majority of amateur radio operators will support this petition. The argument that thousands of amateurs would be disenfranchised is a myth. Nobody has to sell any hardware already purchased. Emergency communications, IF ANY, will remain unaffected. There are very few such stations actually operating and they are causing sufficient problems to warrant this petition for rulemaking. **If there were thousands of these stations in operation the present amateur radio spectrum would be unusable by anyone other than those seeking free email from their yacht. These changes will simply force the users of this technology to take into account their fellow amateurs rather than the speed at which they receive their free email.**

This petition is in the best interests of ALL amateur radio operators and I encourage its adoption.

Thank you,

R. Kevin Stover, ACØH